variance, alternative statistical procedures such as multivariate regression, should be considered.[11]

The multivariate analysis is described in greater detail in Appendix B. Although it is not possible to detail the specific form of the regression that should be used, the general form will include the test statistic, such as the performance measure as the dependent variable of the regression. The independent variables will include a binary variable indicating whether the observation is for an incumbent LEC customer as opposed to a CLEC customer, and variables, such as COS, MSA/non-MSA etc, that describe potentially relevant factors that could influence the performance measure being tested. If the dummy variable for LEC/CLEC displays a statistically significant coefficient, even when all of the other appropriate explanatory variables are included in the analysis, the measure exhibits disparity.

4.   If Potential Disparity Is Observed

If the standard statistics describe above indicate that there is a possible lack of parity, the incumbent LEC must perform more detailed statistical, engineering or other types of analyses to determine the source of the apparent disparity or to show that parity exists. This further analysis may pinpoint the source of the apparent disparity. Alternatively, it may demonstrate that the apparent disparity is not actually a result of differential performance of the incumbent LEC, but rather results from some other sources such as inappropriate disaggregation or differences in customer mix between the incumbent LEC and the CLECs.

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[11]   As stated in the previous footnote, in some cases the number of observations needed will depend on the nature of the test and the data tested.

For example, time to connect may be shorter for urban customers than non-urban customers. If this is the case and a CLEC has a larger proportion of non-urban customers than the incumbent LEC, it would be expected that CLEC customers will experience a longer average time to connect than incumbent LEC customers. The longer average time to connect, however, is not a result of discrimination of disparity of service in this case. Instead the apparent disparity results from the different mix of customers serviced by the incumbent LEC and the CLEC. Once the data has been disaggregated appropriately it becomes clear that equally situated customers of the incumbent LEC and the CLEC are receiving service which is in parity.

In this example, distinguishing between urban and non-urban customers is important for the time to connect measure. It will be important to disaggregate this measure by urban and non-urban clients for both the incumbent LEC and the CLEC. Parity may be tested by comparing services to urban CLEC customers against urban incumbent LEC customers, and by comparing non-urban CLEC customers against non-urban incumbent LEC customers.

Other measures of performance may be more appropriately disaggregated across other variables. The decision of how each performance measure should be disaggregated must carefully be considered in advance so that the appropriate disaggregation can be agreed upon and established as part of the parity test protocol. However, the complexity of telephony markets and products may make it impossible to determine all of the potentially relevant characteristics upon which the data should be disaggregated in the future or in particular circumstances. Furthermore, the relevant characteristics may change over time as markets and products evolve.

In addition, there may be specific circumstances that arise in a given month that lead to the appearance of disparity when parity actually exists. For example, Ameritech observed that in a recent month there was a higher percentage of missed order dates for resale customers than for retail customers. In this case, the higher percentage of missed order dates occurred because the resellers happen to place two large batches of orders on two days when Ameritech's computer system handling these orders was "down." Ameritech's retail customers and customers ordering though resellers were equally inconvenienced on those two days. By chance, however, a relatively large percentage of the resale orders came into the system on those two days, while Ameritech's retail orders tended to be more evenly distributed throughout the month.

Obviously, this type of explanation for potential differences in observed parity of service can only be uncovered through investigation and analysis after the fact. They cannot be established as part of a pre-established parity test protocol. They must be investigated as they are revealed through the first-level parity analysis discussed above. It is for this reason that Ameritech believes that differences in the level of performance, observed in the first phase of the parity test, should be investigated and analyzed fully, using the best available statistical tools and industry expertise. Because of the complexity of factors that affect service provision, it would not be possible to specify the potential techniques that would be most appropriate to uncover the source of an apparent disparity. The use of these sophisticated statistical techniques as well as industry expertise to uncover the causes of apparent disparity are essential to correcting a problem that may exist or explain why a more appropriate analysis results in a finding of parity.

5.   **When True Disparity Is Observed**

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Although paragraph 21 of the NPRM properly states that the Commission does not seek comment on the topic of the establishment of national performance standards, technical standards, and enforcement mechanisms, it is important to make clear that if parity is not observed, the first course of action should be to investigate and correct the problem. Fines or other "punishment" should not be the first result of a finding of true disparity, but should only apply where the incumbent fails to adequately respond.

The statistical analysis outlined above was designed with the intent that if disparity is observed, the incumbent LEC and the CLEC will work quickly to identify and correct the source of the disparity. The statistical tests described above would not be appropriate in a setting where significant fines or other punitive actions were taken against an incumbent LEC that was moving quickly to correct apparent or real disparities in service.

C. **Tests Of Means And Variances**

The Commission next requests comment on what test statistics would be appropriate. And in paragraph 4 of Appendix B, the FCC specifically solicits comments on whether tests of means and variances would be appropriate.

Establishing parity for both the mean and the variance may be an important consideration, but the present lack of record evidence prevents informed comment. Certainly, Ameritech agrees that it would be appropriate to investigate both of these aspects of the distribution of a performance measure.

Ameritech proposes that a test of means would be appropriate for both continuous and binary performance measures. In addition, analyses of variances would be appropriate for

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continuous performance measures as long as the performance measure is normally distributed. A one-tailed Z-statistic at the 95% confidence interval would be appropriate for the test of means. Meanwhile, an F-statistic with a one-sided 95 percent confidence interval would be most appropriate for the test of differences in variances. These are all standard statistics that are generally accepted in the field.[12]

Mean and variance analysis would be most appropriate if imbedded in the format proposed in AT&T's *ex parte* submission. There, AT&T suggested that some maximum number of comparisons should be allowed to fail the first-level parity tests before being deemed evidence of apparent disparity. As described above, AT&T has set the number of allowed disparities too low; nevertheless, the overall framework would be useful. It is in this context that Ameritech supports the test of means and variances based on the Z-statistic and F-statistics, respectively.

D.   Use Of Pooled Variances

Next, the Commission requests comment on whether pooled variances would be appropriate. A pooled variance is calculated by "pooling" or combining the samples from the two populations being compared to produce a simple overall variance for both populations combined. The pooled variance may be used as part of a test investigating the difference between means of two populations. Ameritech maintains that pooled variances would be most appropriate when the variances in the two populations are not significantly different from one

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[12]   As discussed in a previous footnote, these statistics may not be suitable for use in smaller samples. Ameritech's recommendations are based on the assumption that sample sizes are at least 30.

another. The difference in variances can be investigated using the F-statistic mentioned above. This approach is commonly employed in the field.

E.   Analysis Of Completion Intervals Against A Specified Value

In Paragraph 4 of Appendix B, the Commission requests comment on whether "a test that considers what percentage of the time completion intervals exceed a certain value" would be useful. Ameritech already reports completion intervals on this basis. This existing performance measure adequately encompasses the relevant aspects of performance, and no additional measures need be added to the first phase of the standard parity analysis. If additional measures of this nature are considered important they should be added to the list of performance measures based on their functional importance.

F.   Comments On The AT&T Approach

The Commission next requests comment on the statistical analysis presented in AT&T's *ex parte* submission. In general, Ameritech concurs with AT&T's proposal, but as section B above demonstrates, a few important modifications are necessary.

As noted above, AT&T has suggested that if 5 out of 100 measures are observed to be disparate, a lack of overall parity would be established. However, assuming a 95 percent confidence interval, one would expect to see at least 6 out of 100 disparate measures, in more than 38 percent of the tests. This means that even if there were parity, in over one-third of the test periods we would expect to see at least 6 disparate performance measures. Thus, by AT&T's rule a finding of disparity would occur every third month, even if there were no disparity. The number of disparate measures considered acceptable should be established so that

parity is rejected at least 95 percent of the time it exists. Assuming 100 performance measures, more than 9 separate occurrences of disparity would need to occur before disparity could be established with 95 percent confidence.

AT&T's February 3, 1998 *ex parte* submission (at page 3) also asserts that an "extreme difference is defined here as a difference . . . of at least three standard deviations." Elementary statistical theory suggests, however, that a difference of over three standard deviations, while rare, does have some probability of occurring even where parity exists. This further highlights the importance of second-level analysis of differences, as opposed to reflexive but potentially unjustified accusations of discrimination.

G. Comments On BellSouth's Approach

The Commission also requests comment on BellSouth's proposal that "results for one of the entities should not be higher than those for the other for three consecutive months." NPRM, App. B, p. 3. Ameritech does not believe that this criteria is consistent with standard statistical analysis. If the true mean for the incumbent LEC and the competing LEC are equal, then the probability that the sample mean for the incumbent LEC is greater (or less, whichever implies discrimination) than the sample mean for the competing LEC is approximately 50 percent. If the difference in means is independent across months, then the probability that the sample mean for the incumbent LEC is greater than the sample mean for the competing LEC for three consecutive months is equal to 12.5 percent (.5 times 3). Therefore, even if parity existed, BellSouth's proposal would result in a finding of disparity in 12.5 percent of the test periods.

H.   Tests Of Equality of Variances And Proportions

The Commission asks whether the tests of equality of variances or equality of proportions

discussed above would be appropriate for use in conjunction with the tests proposed by AT&T

and BellSouth.

The general framework that AT&T has proposed in its *ex parte* comments can be used

with a wide range of test statistics. If a confidence interval for the tests on individual

performance measures can be established, they will fit into AT&T's general framework for

investigating parity across multiple measures. With the caveats expressed above, and detailed

further in Appendix B below, AT&T's framework can be used for the investigation of

differences in variances.

I.   Bootstrapping And Other Advanced Techniques

In paragraph 8 of Appendix B, the Commission requests comment on the desirability of

using techniques such as boot straps, extreme value statistical theory and the collective risk

model and on whether additional data collection, beyond that contemplated in Part V.C, would

be necessary to allow use of these techniques. As noted above, Ameritech maintains that

sophisticated statistical techniques, including but not limited to those mentioned by the

Commission, may be useful at the later stages of parity analysis. In the interest of efficiency,

first stage analysis would be better limited to more standard statistical techniques.

J.   Analysis Of Consecutive Months' Performance

In Paragraph 6 of Appendix B, the Commission seeks comment on testing the number of

performance measures that fail to achieve parity in two or more consecutive months. In general,

there is some probability that one would observe repeated failures on a single test measure. The probability of observing one measure with two or more consecutive months of failures will depend on the number of overall performance measures performed and the confidence interval chosen. Ameritech proposes that the acceptable number of measures departing from parity in two or more consecutive months should be set so that parity is established 95 percent of the time when parity actually exists.

VI. OTHER ISSUES RAISED BY PETITIONERS

A. Performance Standards

Ameritech agrees with the Commission's tentative conclusion (¶ 125) that it postpone consideration or establishment of performance standards against which the measurements advanced in the NPRM would be measured.

B. Technical Standards

Ameritech agrees with the Commission's tentative conclusion (¶ 127) that it is not necessary to address the issue of uniform technical standards for OSS interfaces. The Commission's authority to require incumbents to provide access to their own OSS is questionable and it is beyond doubt that the Commission cannot require incumbents to redesign their OSS to CLEC specifications, or to other outside standards.

For the same reason, Ameritech strongly objects to the suggestion, advanced by some CLECs, that incumbents must implement voluntary technical standards from industry bodies, such as those affiliated with the Alliance for Telecommunications Industry Solutions ("ATIS"), "within a certain time from the finalization of a standard through the ATIS committees." NPRM, ¶ 129. Forced adherence to standards that are now voluntary would be harmful to the industry and to the standard-setting bodies themselves. First, forced compliance by the incumbent LECs would require CLECs -- many of which lack the technical sophistication or resources to make frequent system modifications -- to make the appropriate changes to their own systems in order to maintain compatibility. Thus, incumbents and CLECs alike would be forced

to spend time and money implementing such standards -- even if the changes were not necessary or cost-beneficial, and even if the changes were to be superseded in the near future.

In addition, mandatory compliance would politicize the standard-setting process and place undue pressure on the standard-setting bodies. Under the current voluntary system, an industry body issues standards that provide technical guidance and uniformity; companies can consider their own business situation and decide for themselves whether the standard features would be useful and cost-beneficial, and if so, when to implement them. If such standards were deemed mandatory, either the industry body would have to completely rethink its approach and make decisions as to its members' business needs, or this Commission would force carriers to adhere to standards designed for a voluntary world. Neither result is acceptable.

C.   Enforcement Mechanisms

Ameritech agrees with the Commission's tentative conclusion (¶ 130) that it would be premature to propose model enforcement mechanisms at this time.

Respectfully submitted,

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Dated: June 1, 1998

Appendix A: Comparison of Proposed Measures

Measurement: **Average Response Time**

Reference: **I. Pre-Ordering**

	Commission	Ameritech	VARIATIONS
Measurement Name	Average Response Time	Average Pre-Ordering Cycle Time	
Calculation	[Σ[(Query Response Date & Time) – (Query Submission Date & Time)]]/Number of Queries Submitted in Reporting Period[1]	{Σ[(Query Response Date and Time) – (Query Submission Date and Time)]}/Total Number of Queries Submitted	
Exclusions and/or Inclusions	• None	• Ameritech proposes that rejected queries should not include "valid returns".	• No variation
Categories (Wholesale)	• Due Date Reservation • Feature Function Availability • Facility Availability • Street Address Validation • Service Availability • Appointment Scheduling • Customer Service Records • Telephone Numbers • Rejected Query Notices	Real Time: • Customer Service Record (per size of CSR) • Address Validation • Telephone Number Selection • Due Date Selection Non-Real Time: • Feature Function Availability • Address Validation (i.e., Street Address Guide) Real Time (by Function): • Average Response Time – Accepts • Average Response Time – Rejects • Percent Rejects Non-Real Time (by Function) • Timeliness of Distribution	• Ameritech groups Due Date Reservation, Facility Availability, and Appointment Scheduling into a single query type, under "Due Date Selection". The NPRM lists each of these three (3) measures as distinct categories of dissaggregation. • Ameritech assumes that the NPRM's Feature Function Availability and Service Availability correspond to Ameritech's Feature Function Availability and Street Address Guide. • The NPRM seeks comment on whether incumbent LECs should exclude pre-ordering sub-functions that are not provided on a real time basis. Ameritech proposes that Feature Availability and Service Availability be provided on a Non-real time basis and that they be measured by timeliness of distribution. • Percent Rejects and Average Response Time – Rejects will be provided for each real time function.
Categories (Retail)	• Due Date Reservation • Feature Function Availability • Facility Availability • Street Address Validation • Service Availability • Appointment Scheduling • Customer Service Records • Telephone Numbers • Rejected Query Notices	• A retail equivalent will be provided for each real time function using emulation.	• The NPRM seeks comment on whether incumbent LECs should exclude pre-ordering sub-functions that are not provided on a real time basis. Ameritech does not offer a retail equivalent for Non-real time functions.

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[1]   A query is defined as an individual request for data.

Appendix A: Comparison of Proposed Measures

Measurement: __Average Completion Interval__

Reference: __II.A. Order Completion Measurements__

	Commission	Ameritech	VARIATIONS
Measurement Name	Average Completion Interval	Average Installation Interval	
Calculation	For incumbent LECs: [Σ[(Completion Date & Time)- (Order Submission Date & Time)]]/Total Number of Orders Completed in Reporting Period For competing carriers: [Σ[(Date and Time of Notice of Completion)-(Order Submission Date & Time)]]/Total Number of Orders Completed in Reporting Period	Resale: {Σ[(Completion Date) – (Application Date)]} / Total Number of Orders Installed UNE: {Σ[(Completion Date) – (Application Date)]} / Total Number of Circuits Installed	▪ The NPRM includes a completion notification component in its competing carrier calculation. Ameritech proposes that the NPRM calculation for incumbent LECs be applied to competing carriers as well. ▪ Ameritech proposes that performance be assessed by date only, rather than date and time.
Exclusions and/or Inclusions	Exclusions: ▪ Canceled orders ▪ Initial order when supplemented by competing carrier ▪ Incumbent LEC orders associated with internal or administrative use of local services	Proposed exclusions: ▪ Canceled orders ▪ Incumbent LEC orders associated with internal use of local services ▪ Orders for which the customer requested a due date beyond the due date offered by Ameritech and outside of the assigned interval ▪ Change (C) orders that are generated as a result of a repair visit ▪ Orders that require force and load ▪ For UNES, exclusions may differ by TC based on individual contractual agreements Proposed inclusions: ▪ All new (N) and supplement orders ▪ Business days only	▪ Ameritech does not support excluding initial orders when supplemented by the competing carrier due to cost burdens associated with the need to redesign ACIS. ▪ Ameritech proposes additional inclusions and exclusions as stated in the previous column.

Categories (Wholesale)	▪ Resale Residential POTS
	  - Dispatch
	  - Non-Dispatch
	▪ Resale Business POTS
	  - Dispatch
		▪ Resale:
		  ▪ Residence POTS
		    ▪ Field Visit
		    ▪ Non-Field Visit
		  ▪ Business POTS
			▪ Ameritech does not categorize the measure based on INP.
			▪ Ameritech does not categorize based on Combination of UNEs.
			▪ Ameritech does not categorize based on Interconnection Trunks.

Appendix A: Comparison of Proposed Measures

	- Non- Dispatch
	• Resale Specials
	  - Dispatch
	  - Non- Dispatch
	• Unbundled Loops
	  - w/ interim number portability (INP)
	  - w/o INP
	• Unbundled Switching
	• Unbundled Local Transport
	• Combinations of UNEs
	  - Dispatch Visit
	  - Non- Dispatch Visit
		• Field Visit
		• Non-Field Visit
		• Centrex
		  • Field Visit
		  • Non-Field Visit
		• Specials
		• Unbundled Loops (without INP)
		• Unbundled Switching
		• Unbundled Transport
			• Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Categories (Retail)	• Retail Residential POTS
	  - Dispatch
	  - Non- Dispatch
	• Retail Business POTS
	  - Dispatch
	  - Non- Dispatch
	• Retail Specials
	  - Dispatch
	  - Non-Dispatch
		• Retail:
		  • Residence POTS
		    • Field Visit
		    • Non-Field Visit
		  • Business POTS
		    • Field Visit
		    • Non-Field Visit
		  • Centrex
		    • Field Visit
		    • Non-Field Visit
		  • Specials
			• Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Appendix A: Comparison of Proposed Measures

Measurement: **Percentage of Due Dates Missed**

Reference: **II.A. Order Completion Measurements**

	Commission	Ameritech	VARIATIONS
Measurement Name	Percentage of Due Dates Missed	Confirmed Due Dates Not Met	
Calculation	[Number of Orders Not Completed within Incumbent LEC Committed Due Date and Time During Reporting Period/Total Number of Orders Scheduled for Completion in Reporting Period] x 100	Resale, Unbundled Loops, EOI, Unbundled Switching, Unbundled Transport: (Number of Orders Installed After the FOC Due Date/Total Number of Orders Installed) * 100	Ameritech systems are set up to calculate due dates missed per "Number of Orders Installed."
Exclusions and/or Inclusions	Exclusions: ▪ Canceled orders ▪ Initial order when supplemented by competing carrier ▪ Incumbent LEC orders associated with internal or administrative use of local services	Proposed exclusions: ▪ Canceled orders ▪ Incumbent LEC orders associated with internal or administrative use of local services ▪ Delays due to no access to the premise (This will vary based on individual contractual agreements) ▪ Change (C) orders that are generated as a result of a repair visit ▪ Orders for which the customer requested a later due date ▪ Missed due dates that are the fault of an independent telecommunications company ▪ Customer not ready Proposed inclusions: ▪ N, T, C orders only. ▪ Business days only. ▪ Missed due dates that were company caused	▪ Ameritech does not support excluding initial orders when supplemented by the competing carrier due to cost burdens associated with the need to redesign ACIS. ▪ Ameritech proposes additional inclusions and exclusions as stated in the previous column.

Categories (Wholesale)	▪ Resale Residential POTS
	- Dispatch
	- Non- Dispatch
	▪ Resale Business POTS
	- Dispatch
	- Non- Dispatch
	▪ Resale Specials
		▪ Resale:
		  ▪ Residence POTS
		    ▪ Field Visit
		    ▪ Non-Field Visit
		  ▪ Business POTS
		    ▪ Field Visit
		    ▪ Non-Field Visit
			▪ Ameritech does not categorize the measure based on INP.
			▪ Ameritech does not categorize based on Combination of UNEs.
			▪ Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.
			▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

	- Dispatch
	- Non- Dispatch
	• Unbundled Loops
	   - w/ interim number portability (INP)
	   - w/o INP
	• Unbundled Switching
	• Unbundled Local Transport
	• Combinations of UNEs
	   - Dispatch
	   - Non- Dispatch
		• Centrex
		   • Field Visit
		   • Non-Field Visit
		• Specials
		• Unbundled Loops
		• Unbundled Switching
		• Unbundled Transport
		• Interconnection Trunks	

Categories (Retail)	• Retail Residential POTS
	   - Dispatch
	   - Non- Dispatch
	• Retail Business POTS
	   - Dispatch
	   - Non- Dispatch
	• Retail Specials
	   - Dispatch
	   - Non- Dispatch
		• Retail:
		   • Residence POTS
		     • Field Visit
		     • Non-Field Visit
		   • Business POTS
		     • Field Visit
		     • Non-Field Visit
		   • Centrex
		     • Field Visit
		     • Non-Field Visit
		   • Specials
			• Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Appendix A: Comparison of Proposed Measures

Measurement: **Average Coordinated Customer Conversion Interval**

Reference: **II.B. Coordinated Customer Conversions**

	Commission	Ameritech	VARIATIONS
Measurement Name	Average Coordinated Customer Conversion Interval	No measure is proposed.	
Calculation	[Σ[(Completion Date and Time for Cross Connection of an Unbundled Loop) – (Disconnection Date and Time of an Unbundled Loop)]] / Total Number of Unbundled Loop Orders for Reporting Period.		
Exclusions and/or Inclusions	Exclusions: • Unbundled loop orders where there is no existing subscriber loop • Delays due to competing carrier following disconnection of unbundled loop		
Categories (Wholesale)	• Unbundled Loops w/ Number Portability • Unbundled Loops w/o Number Portability		
Categories (Retail)	• N/A		

Appendix A: Comparison of Proposed Measures

Measurement: **Average Reject Notice Interval**

Reference: **II.C. Order Status Measurements**

	Commission	Ameritech	VARIATION
Measurement Name	Average Reject Notice Interval	855 Firm Order Confirmation Response Time (Electronically Rejected)	
Calculation	{Σ[(Date and Time of Order Rejection) - (Date and Time of Receipt of Order)]]/Number of Orders Rejected in Reporting Period	{Σ[(Date and Time Rejected FOC was Made Available to the TC) – (Date and Time Service Order was Received by Ameritech)]} / Total Number of Rejected FOCs for Electronically Received Orders	
Exclusions and/or Inclusions	• None	Proposed inclusions: • The measure is calculated for electronically received orders only. • The measure is based on business days.	• Ameritech proposes additional inclusions and exclusions as stated in the previous column.

Categories (Wholesale)	• Resale Residential POTS
	  - Dispatch
	  - Non- Dispatch
	• Resale Business POTS
	  - Dispatch
	  - Non- Dispatch
	• Resale Specials
	  - Dispatch
	  - Non- Dispatch
	• Unbundled Loops
	  - W/ interim number portability (INP)
	  - W/o INP
	• Unbundled Switching
	• Unbundled Local Transport
	• Combinations of UNEs
	  - Dispatch
	  - Non- Dispatch
	• Interconnection Trunks
		• Resale Residential POTS
		• Resale Business POTS
		• Resale Centrex
		• Resale Specials
		• Unbundled Loops
		• Unbundled Switching
			• Ameritech does not categorize based on Dispatch/Non-Dispatch.
			• Ameritech does not categorize the measure based on INP.
			• Ameritech does not categorize based on Combination of UNEs.
			• Ameritech does not categorize based on Unbundled Local Transport and Interconnection Trunks.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Categories (Retail)	• Retail Residential POTS
	  - Dispatch
	  - Non- Dispatch
	• Retail Business POTS
	  - Dispatch
		• Retail Residential POTS
		• Retail Business POTS
		• Retail Centrex
		• Retail Specials
			• Ameritech does not categorize based on Dispatch/Non-Dispatch.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.
			• Ameritech uses win-back performance as a retail analog.

Appendix A: Comparison of Proposed Measures

	- Non- Dispatch
	■ Retail Specials
	     - Dispatch
	     - Non- Dispatch
		■ Ameritech uses win-back
		performance as a retail analog.	

Appendix A: Comparison of Proposed Measures

Measurement: Average FOC Notice Interval

Reference: II.C. Order Status Measurements

	Commission	Ameritech	VARIATIONS
Measurement Name	Average FOC Notice Interval	Resale: 855 Firm Order Confirmation Response Time (Electronically Received) UNE: Access Service Request Firm Order Confirmation Response Time	
Calculation	[Σ[(Date and Time of FOC) - (Date and Time of Receipt of Valid Order)]]/Number of Orders Confirmed in Reporting Period	{Σ[(Date and Time FOC Made Available to the TC) – (Date and Time Service Order Received by Ameritech)]} / Total Number of FOCs for Electronically Received Orders	Ameritech used "Date and Time FOC *Made Available* to the TC," while the NPRM uses "Date and Time of FOC."
Exclusions and/or Inclusions	Exclusions: • Rejected orders	Proposed exclusions: • Rejected orders Proposed inclusions: • The measure is calculated for electronically received orders only. • The measure is based on business days.	• No variation

Categories (Wholesale)	• Resale Residential POTS
	  - Dispatch
	  - Non- Dispatch
	• Resale Business POTS
	  - Dispatch
	  - Non- Dispatch
	• Resale Specials
	  - Dispatch
	  - Non- Dispatch
	• Unbundled Loops
	  - W/ interim number portability (INP)
	  - W/o INP
	• Unbundled Switching
	• Unbundled Local Transport
	• Combinations of UNEs
	  - Dispatch
		• Resale Residential POTS
		• Resale Business POTS
		• Resale Centrex
		• Resale Specials
		• Unbundled Loops
		• Unbundled Switching
		• Unbundled Transport
		• Interconnection Trunks
			• Ameritech does not categorize based on Dispatch/Non-Dispatch.
			• Ameritech does not categorize the measure based on INP.
			• Ameritech does not categorize based on Combination of UNEs.
			• Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Appendix A: Comparison of Proposed Measures

	- Non- Dispatch ■ Interconnection Trunks		

Categories
(Retail)
	■ Retail Residential POTS
	    - Dispatch
	    - Non- Dispatch
	■ Retail Business POTS
	    - Dispatch
	    - Non- Dispatch
	■ Retail Specials
	    - Dispatch
	    - Non- Dispatch
		■ Retail Residential POTS
		■ Retail Business POTS
		■ Retail Centrex
		■ Retail Specials
		
		■ Ameritech uses win-back performance as a retail analog.
			■ Ameritech does not categorize based on Dispatch/Non-Dispatch.
			■ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.
			■ Ameritech uses win-back performance as a retail analog.

Appendix A: Comparison of Proposed Measures

Measurement: <u>Average Jeopardy Notice Interval</u>

Reference: <u>II.C. Order Status Measurements</u>

			VARIATIONS
Measurement Name	Average Jeopardy Notice Interval	No measure is proposed	
Calculation	[Σ[(Date and Time of Scheduled Due Date on FOC) – (Date and Time of Jeopardy Notice)]]/Number of Orders in Jeopardy in Reporting Per		
Exclusions and/or Inclusions	▪ None		

Categories (Wholesale)	▪ Resale Residential POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Resale Business POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Resale Specials
	  - Dispatch
	  - Non- Dispatch
	▪ Unbundled Loops
	  - w/ interim number portability (INP)
	  - w/o INP
	▪ Unbundled Switching
	▪ Unbundled Local Transport
	▪ Combinations of UNEs
	  - Dispatch
	  - Non- Dispatch
	▪ Interconnection Trunks		

Categories (Retail)	▪ Retail Residential POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Retail Business POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Retail Specials
	  - Dispatch
	  - Non- Dispatch		

Appendix A: Comparison of Proposed Measures

Measurement: <u>Percentage of Orders Given Jeopardy Notices</u>

Reference: <u>II.C. Order Status Measurements</u>

	Comparison		VARIATION
Measurement Name	Percentage of Orders Given Jeopardy Notices	No measure is proposed	
Calculation	Number of Orders Given Jeopardy Notices in Reporting Period/Number of Orders Confirmed in Reporting Period		
Exclusions and/or Inclusions	▪ None		

Categories (Wholesale)	▪ Resale Residential POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Resale Business POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Resale Specials
	  - Dispatch
	  - Non- Dispatch
	▪ Unbundled Loops
	  - w/ interim number portability (INP)
	  - w/o INP
	▪ Unbundled Switching
	▪ Unbundled Local Transport
	▪ Combinations of UNEs
	  - Dispatch
	  - Non- Dispatch
	▪ Interconnection Trunks		

Categories (Retail)	▪ Retail Residential POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Retail Business POTS
	  - Dispatch
	  - Non- Dispatch
	▪ Retail Specials
	  - Dispatch
	  - Non- Dispatch		

Appendix A: Comparison of Proposed Measures

Measurement: __Average Completion Notice Interval__

Reference: __II.C. Order Status Measurements__

Measurement Name	Common	Alternative	Variation
Measurement Name	Average Completion Notice Interval	865 Completion Notification Response Time (Electronically Received)	
Calculation	[Σ[(Date and Time of Notice of Completion) - (Date and Time of Completion of Work)]]/Number of Orders Completed in Reporting Period	{Σ[(Date and Time of Completion Notification Made Available to the TC) – (Work Completion Date Reported by the Technician)]} / Total Number of Completion Notifications For Electronically Received Orders	▪ The NPRM measure is calculated using "Number of Orders Completed," while Ameritech uses the "Number of Completion Notifications." ▪ Ameritech reports this measure by date since work completion is not tracked by date and time.
Exclusions and/or Inclusions	▪ None	Proposed inclusions: ▪ The measure is calculated for electronically received orders only.	▪ Ameritech calculates the measure using business days.

Categories (Wholesale)	▪ Resale Residential POTS
	   - Dispatch
	   - Non- Dispatch
	 ▪ Resale Business POTS
	   - Dispatch
	   - Non- Dispatch
	 ▪ Resale Specials
	   - Dispatch
	   - Non- Dispatch
	 ▪ Unbundled Loops
	   - W/ interim number portability (INP)
	   - W/o INP
	 ▪ Unbundled Switching
	 ▪ Unbundled Local Transport
	 ▪ Combinations of UNEs
	   - Dispatch
	   - Non- Dispatch
	 ▪ Interconnection Trunks
		▪ Resale Residential POTS
		 ▪ Resale Business POTS
		 ▪ Resale Centrex
		 ▪ Resale Specials
		 ▪ Unbundled Loops
		 ▪ Unbundled Switching
			▪ Ameritech does not categorize based on Dispatch/Non-Dispatch.
			 ▪ Ameritech does not categorize the measure based on INP.
			 ▪ Ameritech does not categorize based on Combination of UNEs.
			 ▪ Ameritech does not categorize based on Unbundled Local Transport and Interconnection Trunks.
			 ▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.

Categories (Retail)	▪ Retail Residential POTS
	   - Dispatch
	   - Non- Dispatch
	 ▪ Retail Business POTS
	   - Dispatch
	   - Non- Dispatch
		▪ Retail Residential POTS
		 ▪ Retail Business POTS
		 ▪ Retail Centrex
		 ▪ Retail Specials
		
		 ▪ Ameritech uses win-back
			▪ Ameritech does not categorize based on Dispatch/Non-Dispatch.
			 ▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.
			 ▪ Ameritech uses win-back performance as a retail analog.

Appendix A: Comparison of Proposed Measures

	▪ Retail Specials
	    - Dispatch
	    - Non- Dispatch
		performance as a retail analog.	